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Mr. Jeff S. Jordan
Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Commission
Washington, DC 20463

RE: MUR 6754

October 3, 2013

Dear Mr. Jordan,

I am in receipt of your letter (September 28, 2013) regarding allegations that I have violated Federal Election Campaign Act of 1971. I have also read the cover letter for the complaint as outlined and am deeply disappointed to see that it comes from my former employer but not surprised to see what can only be considered another retaliatory act by them against me for filing an EEOC complaint regarding the reduction in force of my position. It is all very sad.

In response to your question as to why no action should be taken against me, I provide the following responses and information for your consideration.

1. As an AMVETS' employee, I was required to use the corporate credit card for any and all expenses related to my participation, and representing of AMVETS, to other organizations. This included ASAE. All expenses related to my representation in ASAE were approved by the Executive Director in advance and then again monthly as part of the approval for payment of my credit card bill.
2. Additionally, and not long before my departure, my credit card statements were reviewed and reconciled by National Finance Officer Fertie Brand and a report was issued stating that all reporting, receipts and material were found to be in order.
3. Finally, and on an annual basis, my credit card statements were reviewed in detail as part of our annual audit with other key staff and no error in use was found. The auditors did once raise the use of the corporate cards (mine included) for personal expenses, which at the time were allowed by our credit card use policy. That policy was changed the next year and no further personal charges were put on the corporate cards. This changed occurred under Commander Duane Miskulin.

As an employee, I was following the directives; policy and procedures set forth by AMVETS. Should we all have read the fine print on the invoices that were being paid, in hindsight, I think so. However, I believe that those in leadership at the time of my employment in their direction of me did so without any intent to violate law and without the full understanding of this limitation of the PAC contributions. Certainly, we have all learned from this experience.

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As for those in leadership now, while I wonder about their motives in filing this complaint naming me, I find solace in knowing that my record as a successful AMVETS employee remains unblemished even in the face of challenges like this. I have attached a copy of a reference letter I received when I left AMVETS for your review. Further, it is embarrassing to me to see the organization that I love fall to the depths of actions like these clearly set out to not take responsibility for their actions and to blame others. My former assistant Diane Simons, who remained with AMVETS after my departure, can verify that all my paperwork (including that related to this credit card) was in order and also add insight into the very intentional and deliberate actions of AMVETS leadership to hurt me personally for filing my EEOC complaint.

Please know that I am happy to assist you in any way possible but I have not been an employee of AMVETS since 2010. This issue was not raised as a concern until two years after I was separated, not for performance, but as a reduction in force by AMVETS and a pending employer-employee suit had been filed. I, understanding that this is a confidential matter, would like to know if it would be acceptable to you for me to forward this material to the EEOC for my case? My sense is that they will find this action relevant to my complaint. Please let me know if this is acceptable to you.

I appreciate your efforts in trying to prevent this type of fraud in our election system, however, this charge is meant to be malicious, not an attempt at justice. As final confirmation that AMVETS is fully aware of their responsibility for this, I am attaching a letter I received just a few short months ago asking my assistance and assuring me they were resolving this matter.

Sincerely,


Velma R. Hart

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